

## REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 21, 2012

ANALYST: Christopher Whyrick

- I. COMMITTEE: Ron Paul 2012 Presidential Campaign Committee, Inc.  
C00495820  
Lori Pyeatt, Treasurer  
845 West Plantation Drive  
Clute, TX 77531
- II. RELEVANT STATUTES: 11 CFR § 104.3(a) and (b)  
2 U.S.C. § 434(b)(2) and (4)
- III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Ron Paul 2012 Presidential Campaign Committee, Inc. ("the Committee") amended its 2011 October Quarterly and 2011 Year End Reports to disclose additional receipts of \$501,700.00 and additional disbursements of \$5,649.65 which were not disclosed in the original reports (Attachment 2).

**2011 October Quarterly Report**

On October 15, 2011, the Committee filed the original 2011 October Quarterly Report covering the period from July 1, 2011 through September 30, 2011. The report disclosed \$3,855,388.25 in receipts on Line 17(a)(i) (Itemized Contributions from Individuals) and \$3,815,901.30 in receipts on Line 17(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 11952631253).

On January 31, 2012, the Committee filed an Amended 2011 October Quarterly Report. The report disclosed \$3,838,045.04 in receipts on Line 17(a)(i) and

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\$3,834,944.51 on Line 17(a)(ii) of the Detailed Summary Page, a total increase in receipts of \$1,700.00 (Image 12970296543).

On March 14, 2012, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2011 Year End Report, received February 20, 2012. Among other items, the RFAI requested clarification regarding the increase in receipts and disbursements<sup>1</sup> disclosed on the Amended 2011 October Quarterly Report, received January 31, 2012, that were not disclosed in the original filing (Image 12330004022).

On April 18, 2012, the Committee filed an Amended 2011 October Quarterly Report. The report disclosed \$3,858,190.95 in receipts on Line 17(a)(i) and \$3,814,798.60 on Line 17(a)(ii) of the Detailed Summary Page, a total increase of \$1,700.00 from the original report (Image 12951484651; Attachment 3).

On the same day, the Committee filed a Miscellaneous Electronic Submission ("Form 99"), which stated in part:

"...The increase in receipts of \$1,700.00 and increase in disbursements of \$1,700.00 on the 2011 October Quarterly Amended Report consists of seven in-kind contributions that were inadvertently left off of the original filing" (Image 12971120381).

On April 20, 2012, the Committee filed a Form 99, which stated:

"While preparing a response to the recent RFAI letters, the Campaign discovered a significant number of instances in which contributors provided slightly different name and/or address information when making online contributions that prevented their contributions from being aggregated together correctly in the computer database records. The campaign has corrected those errors and taken steps to minimize the likelihood that problem will occur in the future. Amended reports have been filed from the inception of the Campaign to date to correct these reporting discrepancies" (Image 12971190048).

On May 16, 2012, the Reports Analysis Division (RAD) Analyst contacted Ms. Dina Watts, Committee representative, to inform her that the issue of increased activity on the 2011 October Quarterly Report may be referred to another office for further Commission action. The Analyst offered the Committee the opportunity to add any additional information to the public record to further explain the reason for the increases in receipts and disbursements. Ms. Watts responded that she would provide additional clarification for the public record (Attachment 5).

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<sup>1</sup> The RFAI referenced a \$1,700 increase in disbursements on Schedule B. However, the Schedule B entries were actually balancing entries for in-kind contributions disclosed on Schedule A, and not actual disbursements. Thus the Schedule B entries are not included in this referral.

## 2011 Year End Report

On January 31, 2012, the Committee filed the original 2011 Year End Report covering the period from October 1, 2011 through December 31, 2011. The report disclosed no receipts on Line 18 (Transfers from Other Authorized Committees) of the Detailed Summary Page (Image 12970350880). The report also disclosed \$15,043,493.51 in disbursements on Line 23 (Operating Expenditures) of the Detailed Summary Page (Image 12970350881).

On February 20, 2012, the Committee filed an Amended 2011 Year End Report. The report disclosed \$500,000.00 in receipts on Line 18 of the Detailed Summary Page, an increase of \$500,000.00 from the original report (Image 12970444303; Attachment 3). The report also disclosed \$15,049,143.16 in disbursements on Line 23 of the Detailed Summary Page, an increase of \$5,649.65 from the original report (Image 12970444304; Attachment 4).

On March 14, 2012, an RFAI was sent to the Committee referencing the Amended 2011 Year End Report, received February 20, 2012. Among other items, the RFAI requested clarification regarding the increase in receipts and disbursements disclosed on the Amended 2011 Year End Report, received February 20, 2012, that were not disclosed in the original filing (Image 12330004022).

On April 18, 2012, the Committee filed an Amended 2011 Year End Report. The report disclosed no change in receipts or disbursements from the previous amendment (Images 12951493454-55).

On the same day, the Committee filed a Form 99, which stated in part:

"...The increase in receipts of \$500,000.00 on the 2011 Amended Year-End Report is a committee transfer from the Committee to Re-Elect Ron Paul that was inadvertently left off of the original filing. The amended report was filed to properly report this transfer. The increase in disbursements of \$5,649.65 on the 2011 Amended Year End Report is the net effect of corrections made regarding expenses. All expenses requiring to be itemized now show on the amended filing" (Images 12971120381-82).

On May 16, 2012, the RAD Analyst contacted Ms. Watts to inform her that the issue of increased activity on the 2011 Year End Report may be referred to another office for further Commission action. The Analyst offered the Committee the opportunity to add any additional information to the public record to further explain the reason for the increases in receipts and disbursements. Ms. Watts responded that she would provide additional clarification for the public record (Attachment 5).

On May 17, 2012, the Committee filed a Form 99, which stated:

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“This letter is to provide additional information regarding the initial unreported committee transfer of \$500,000 on December 1, 2011 received by the Ron Paul 2012 Presidential Campaign Committee, Inc. from the Committee to Re-Elect Ron Paul. The transmission of the transfer by the Committee to Re-Elect Ron Paul was correctly reported on their 2011 Year-End Report, but the receipt of that transfer was inadvertently omitted from the Ron Paul 2012 PCC’s 2011 Year-End Report. A report was corrected, amended and filed upon discovery of the omission within three weeks of the original filing. Both committees have reviewed and revised their procedures for handling and reporting committee transfers to ensure that this error will not be repeated” (Image 12971223227).

To date, no further communications have been received from the Committee regarding these matters.

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O-Index (2011-2012)												
Cmte. ID: C00495820 Cmte. Name: RON PAUL 2012 PRESIDENTIAL CAMPAIGN COMMITTEE INC. Filing Frequency: MONTHLY FILER												
Treasurer Name: PYEATT, LORI Address: 845 W PLANTATION DR, CLUTE, TX 77531												
Cmte. Type: P (PRESIDENTIAL) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: MONTHLY FILER												
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash
MS-T			4/18/2012	54	12030790169	10/1/2011	12/31/2011					
MS-T			4/18/2012	1	1295151786							
MS-T			4/18/2012	2	12971120381							
MS-T			4/20/2012	1	12971190048							
MS-T			5/17/2012	1	12971223227							
MS-T			6/5/2012	1	12951846418							
MS-T			7/18/2012	1	12952520123							
RQ2	YE	A	3/1/2012	34	12330004022	10/1/2011	12/31/2011	3/1/2012				
RQ2	M2	N	3/1/2012	2	12330004058	1/1/2012	1/31/2012	3/1/2012				
RQ2	M4	N	5/1/2012	2	12330006263	3/1/2012	3/31/2012	5/1/2012				
RQ2	M7	N	8/1/2012	4	12330010135	6/1/2012	6/30/2012	8/1/2012				
F3PN	Q2	N	7/15/2011	2393	11931927324	1/1/2011	6/30/2011		\$0	\$4,518,947	\$1,552,770	\$2,968,177
F3PA	Q2	A	1/31/2012	2383	12950320482	1/1/2011	6/30/2011		\$0	\$4,512,362	\$1,552,770	\$2,959,592
F3PA	Q2	A	4/18/2012	2395	12951482250	1/1/2011	6/30/2011		\$0	\$4,537,962	\$1,570,770	\$2,959,592
F3PN	Q3	N	10/15/2011	8806	11952631251	7/1/2011	9/30/2011		\$2,966,177	\$8,268,499	\$7,559,908	\$3,674,788
F3PA	Q3	A	1/31/2012	8695	12970296541	7/1/2011	9/30/2011		\$2,959,592	\$8,270,199	\$7,551,608	\$3,668,183
F3PA	Q3	A	4/18/2012	8803	12951484649	7/1/2011	9/30/2011		\$2,959,592	\$8,270,199	\$7,551,608	\$3,668,183
F3PN	YE	N	1/31/2012	10318	12970359878	10/1/2011	12/31/2011		\$3,668,183	\$13,322,156	\$15,085,426	\$1,904,914
F3PA	YE	A	2/20/2012	16338	12970444301	10/1/2011	12/31/2011		\$3,668,183	\$13,819,510	\$15,091,076	\$2,396,617
F3PA	YE	A	4/18/2012	17901	12951493452	10/1/2011	12/31/2011		\$3,668,183	\$13,819,510	\$15,091,076	\$2,396,617
F3PN	M2	N	2/20/2012	6794	12970460809	1/1/2012	1/31/2012		\$2,396,617	\$4,481,208	\$5,233,013	\$1,644,814
F3PA	M2	A	4/18/2012	7433	12951511363	1/1/2012	1/31/2012		\$2,396,617	\$4,481,208	\$5,233,013	\$1,644,814
F3PN	M3	N	3/16/2012	4821	12970627321	2/1/2012	2/29/2012		\$1,644,814	\$3,271,399	\$3,548,698	\$1,367,485
F3PA	M3	A	4/20/2012	6676	12951532507	2/1/2012	2/29/2012		\$1,644,814	\$3,271,399	\$3,548,698	\$1,367,485
F3PN	M4	N	4/20/2012	7561	12971131251	3/1/2012	3/31/2012		\$1,367,485	\$2,631,522	\$2,218,234	\$1,780,773
F3PA	M4	A	6/5/2012	7561	12951938794	3/1/2012	3/31/2012		\$1,367,485	\$2,631,522	\$2,218,234	\$1,780,773
F3PN	M5	N	5/19/2012	4657	12951861236	4/1/2012	4/30/2012		\$1,780,773	\$2,049,944	\$1,365,721	\$2,464,997
F3PA	M5	A	7/18/2012	4661	12952509433	4/1/2012	4/30/2012		\$1,780,773	\$2,049,944	\$1,365,721	\$2,464,997
F3PN	M6	N	6/18/2012	2486	12952135304	5/1/2012	5/31/2012		\$2,464,997	\$1,786,009	\$989,622	\$3,281,394
F3PA	M6	A	7/18/2012	2827	12952514598	5/1/2012	5/31/2012		\$2,464,997	\$1,786,009	\$989,622	\$3,281,394
F3PN	M7	N	7/18/2012	257	12952517472	6/1/2012	6/30/2012		\$3,281,394	\$45,606	\$488,062	\$2,838,928
F3PA	M7	A	8/17/2012	329	12952657176	6/1/2012	6/30/2012		\$3,281,394	\$45,606	\$488,062	\$2,838,928
F1		N	4/26/2011	6	11030601582							
F3A		A	5/13/2011	4	11931360284							
F2N		N	5/13/2011	1	11931360288							
Totals									\$40,947,038	\$38,449,855		

O-Index (2009-2010)												
Cmte. ID: C00495820 Cmte. Name: RON PAUL 2012 PRESIDENTIAL CAMPAIGN COMMITTEE INC. Filing Frequency: MONTHLY FILER												
Treasurer Name: PYEATT, LORI Address: 845 W PLANTATION DR, CLUTE, TX 77531												
Cmte. Type: P (PRESIDENTIAL) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: MONTHLY FILER												
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash
F1		N	4/26/2011	6	11030601582							
F3A		A	5/13/2011	4	11931360284							
F2N		N	5/13/2011	1	11931360288							
Totals									\$40,947,038	\$38,449,855		

No records were found for this cycle.

O-Index

O-Index (2007-2008)															
Cmte. ID: C00495820				Cmte. Name: RON PAUL 2012 PRESIDENTIAL CAMPAIGN COMMITTEE INC.											
Treasurer Name: PYEATT, LORI				Address: 845 W PLANTATION DR, CLUTE, TX 77531											
Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)				Filing Frequency: MONTHLY FILER											
Cmte. Type: P (PRESIDENTIAL)															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debts	Loans	Debts & Loans
F2		N	3/12/2007	2	27039401977				-	-	-	-	-	-	-
Totals											\$0				\$0

**Ron Paul 2012 Presidential Campaign Committee, Inc. (C00495820)**

**Overview of Additional Receipts**

Report Name	Total Additional Receipts	Line Number(s)
2011 October Quarterly Report/Amended 2010 October Quarterly Report, received 4/18/12	\$1,700.00	17(a)(i), 17(a)(ii)
2011 Year End Report/Amended 2011 Year End Report, received 4/18/12	\$500,000.00	18
<b>Total Additional Receipts</b>	<b>\$501,700.00</b>	

**Overview of Additional Disbursements**

Report Name	Total Additional Disbursements	Line Number(s)
2011 Year End Report/Amended 2011 Year End Report, received 4/18/12	\$5,649.65	23
<b>Total Additional Disbursements</b>	<b>\$5,649.65</b>	

**Total Increase in Activity on Amended Reports: \$507,349.65**

**Ron Paul 2012 Presidential Campaign Committee, Inc. (C00495820)**

**Additional Receipts by Line Number**

2011 October Quarterly Report/Amended 2011 October Quarterly Report, received 4/18/12

Report Line	2011 October Quarterly Report (Image 11952631251)	Amended 2011 October Quarterly Report received 4/18/12 (Image 12951484649)	Variance Amount
Line 17(a)(i): Itemized Contributions from Individuals	\$3,855,388.25	\$3,858,190.95	\$2,802.70
Line 17(a)(ii): Unitemized Contributions from Individuals	\$3,815,901.30	\$3,814,798.60	-\$1,102.70
Total Variance:			\$1,700.00

2011 Year End Report/Amended 2011 Year End Report, received 4/18/12

Report Line	2011 Year End Report (Image 12970350878)	Amended 2011 Year End Report received 4/18/12 (Image 12951492452)	Variance Amount
Line 18: Transfers from Other Authorized Committees	\$0.00	\$500,000.00	\$500,000.00
Total Variance:			\$500,000.00



**Ron Paul 2012 Presidential Campaign Committee, Inc. (C00495820)**

**Additional Disbursements by Line Number**

2011 Year End Report/Amended 2011 Year End Report, received 4/18/12

Report Line	2011 Year End Report (Image 12970350878)	Amended 2011 Year End Report, received 4/18/12 (Image 12951493452)	Variance Amount
Line 23: Operating Expenditures	\$15,043,493.51	\$15,049,143.16	\$5,649.65
Total Variance:			\$5,649.65